

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

ANAS ELHADY, *et al.*,

Plaintiffs,

V.

CHARLES H. KABLE, Director of the Terrorist Screening Center; in his official capacity, *et al.*;

Defendants.

Case No. 16-cv-00375
Hon. Anthony J. Trenga

PLAINTIFFS' FOURTH MOTION TO COMPEL

Pursuant to Fed R. Civ. P 37(a)(3)(B) and E.D. Va. L.R. 37, Plaintiffs hereby move to compel documents and information regarding the TSA’s “Quiet Skies” program, which exists to monitor “unknown or partially known terrorists” at the same level as “Selectees.” The existence of the “Quiet Skies” program was first revealed in a Boston Globe article on July 28, 2018, and the TSA only publicly confirmed its existence in statements provided to the press on July 30, 2018.

Pursuant to Federal Rule of Civil Procedure 26(c)(1), Plaintiffs' counsel certifies the parties have met and conferred in good faith, but have not been able to reach agreement as to the requested information. As of July 30, 2018, Defendants' counsel have indicated they can neither confirm nor deny the "Quiet Skies" program's existence, including the accuracy of any information reported by the Boston Globe.

Respectfully submitted,

COUNCIL ON AMERICAN-ISLAMIC
RELATIONS

BY: /s/ Gadeir Abbas
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**Gadeir Abbas is licensed in VA, not in D.C.
Practice limited to federal matters.*

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Dated: August 1, 2018

CERTIFICATE OF SERVICE

I hereby certify that on August 1, 2018, I electronically filed the foregoing by using the Court's ECF system. I further certify that all participants in the case are registered ECF users and will be electronically served by the Court's ECF notification system.

Respectfully submitted,

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